

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

ANDREW and LAUREN HACKNEY,

Plaintiffs,

vs.

Civil Action No.

ALLEGHENY COUNTY, JENNA REED  
MICHELLE VESELICKY, MICHELLE HANEY,  
EMMA EMBAR, and MONICA ANDERSON-  
RHONES,

Defendants.

**NOTICE OF REMOVAL**

TO: The Clerk of the United States District Court for the Western District of Pennsylvania.

1. Plaintiffs initiated suit in the Court of Common Pleas of Allegheny County, Pennsylvania and filed a Complaint on March 1, 2024. A copy of the Complaint is attached as Exhibit "A".

2. Plaintiffs then filed a "Complaint to Join Additional Defendants." On March 1, 2024. A copy of the Complaint is attached as Exhibit "B".

3. The Complaint alleges violations of the Fourteenth Amendment of the U.S. Constitution, 42 U.S.C. §1983, 42 U.S. Code §1985, Section 504 of the Rehabilitation Act, and the Americans with Disabilities Act.

4. A copy of the electronic Docket from the Department of Court Records of Allegheny County, Pennsylvania, is attached as Exhibit "C".

5. Removal of Plaintiffs' claims is based upon federal question jurisdiction under 28 U.S.C. § 1331 and is appropriate under the provisions of 28 U.S.C. §1441(a).

6. Pursuant to 28 U.S.C. §1446(b)(1), this Notice is filed within 30 days of service of the Complaint.

7. Pursuant to 28 U.S.C §1446(b)(2) all Defendants who have been properly served consent to the removal of the action.

8. A notice of the filing of this Notice of Removal has been filed today with the Department of Court Records of Allegheny County, Pennsylvania.

WHEREFORE, Defendants request that this matter be removed to the United States District Court for the Western District of Pennsylvania.

Respectfully submitted,

/s/ Frances Marie Liebenguth  
Frances Marie Liebenguth  
Assistant County Solicitor  
Pa. I.D. #314845

ALLEGHENY COUNTY LAW DEPARTMENT  
300 Fort Pitt Commons Building  
445 Fort Pitt Boulevard  
Pittsburgh, PA 15219  
(412) 350-1108

[Frances.Liebenguth@alleghenycounty.us](mailto:Frances.Liebenguth@alleghenycounty.us)

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the within **NOTICE OF REMOVAL** was served by certified mail and email, this 28<sup>th</sup> day of March 2024, upon the following:

maggie@ocwjustice.com  
Margaret S. Coleman, Esq.  
O'BRIEN COLEMAN & WRIGHT  
116 Boulevard of the Allies  
Pittsburgh, PA 15222  
(Counsel for Plaintiff)

/s/ Frances Marie Liebenguth  
Frances Marie Liebenguth  
Assistant County Solicitor